

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

LOUJAIN HATHLOUL ALHATHLOUL,)

Plaintiff,)

v.)

DARKMATTER GROUP,)

MARC BAIER,)

RYAN ADAMS, and)

DANIEL GERICKE)

Defendants.)

Civil No. 3:21-cv-01787-IM

JURISDICTIONAL DISCOVERY ORDER

Pursuant to the Court's Order Granting Plaintiff's Motion for Limited Jurisdictional Discovery, ECF 80, and the Court's Order Granting Plaintiff's Motion for Oral Depositions and Limiting the Scope of Plaintiff's Discovery Requests, ECF 88, it is hereby **ORDERED**:

1. Jurisdictional discovery shall be completed by no later than 60 days of this order, unless additional time is required by the mandatory rules of the jurisdictions within which the deponents reside.

2. **Written Discovery.** Plaintiff shall serve on each Defendant interrogatories and requests for production of documents as appears in the Appendix to the Court's Order Granting Plaintiff's Motion for Oral Depositions and Limiting the Scope of Plaintiff's Discovery Requests, ECF 88, within one (1) day of this order. Defendants shall respond to the interrogatories and requests for production of documents within fourteen (14) days of Plaintiff's service of the written discovery requests, or entry of a suitable protective order (whichever

occurs later) and will make rolling productions of responsive, non-privileged documents promptly thereafter. Defendants must complete their production of documents by no later than fourteen (14) days after service of their responses, or entry of a protective order (whichever occurs later), unless otherwise agreed to by the parties or approved by the Court.

3. **ESI.** Disclosure or discovery of electronically stored information will be handled as provided by the Federal Rules of Civil Procedure and the Local Rules. Defendants shall make best efforts to provide native files and accompanying metadata for electronically stored information. Defendants may produce hard copy or documents originally stored in PDF format in PDF format, subject to Plaintiff's right to move to compel native data.

4. **Remote, oral depositions.** Pursuant to the Court's Order Granting Plaintiff's Motion for Oral Depositions, ECF 88, Defendants will participate in depositions conducted orally, remotely, and live. Plaintiff shall serve notice of remote, oral depositions to each of the individual Defendants and a corporate designee of DarkMatter Group no later than seven (7) days of this order. The parties will follow the applicable rules of the applicable jurisdictions, to the extent they are mandatory. Defendants will accomplish compliance for purposes of participating in the depositions noticed pursuant to this order, and to seek any necessary extensions in the event necessary to any additional time reasonably needed for compliance. Consistent with applicable rules, Defendants will make the deponents available within the 60 days time period for jurisdictional discovery. Each deposition shall be limited to a maximum of one day of seven (7) hours on the record, excluding break time.

5. **Protective Order.** The parties will promptly file a Stipulated Protective Order to protect confidential information that is subject to discovery.

IT IS SO ORDERED.

ENTERED: 3/29/2024

/s/ Karin J. Immergut
Karin J. Immergut
United States District Judge